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**UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

In re:

PG&E CORPORATION,

- and -

**PACIFIC GAS AND ELECTRIC
COMPANY,**

Debtors.

- ☐ Affects PG&E Corporation
☐ Affects Pacific Gas and Electric
Company
☒ Affects both Debtors

** All papers shall be filed in the Lead
Case, No. 19-30088 (DM).*

Bankruptcy Case No. 19-30088 (DM)

Chapter 11

(Lead Case) (Jointly Administered)

**REORGANIZED DEBTORS' REPORT ON
RESPONSES TO TWENTY-FIFTH
SECURITIES CLAIMS OMNIBUS
OBJECTION (NOTEHOLDER SECURITIES
CLAIMS) AND REQUEST FOR ORDER BY
DEFAULT AS TO UNOPPOSED
OBJECTIONS**

[Re: Dkt. No. 13969]

**Resolving Objections Set for Hearing
October 3, 2023 at 10:00 a.m. (Pacific Time)**

1 **REQUEST FOR ENTRY OF ORDER BY DEFAULT**

2 PG&E Corporation (“**PG&E Corp.**”) and Pacific Gas and Electric Company (the “**Utility**”), as
3 debtors and reorganized debtors (collectively, the “**Debtors**” or the “**Reorganized Debtors**”) in the
4 above-captioned chapter 11 cases (the “**Chapter 11 Cases**”) hereby request, pursuant to Rule 9014-
5 1(b)(4) of the Bankruptcy Local Rules for the United States District Court for the Northern District of
6 California, as made applicable to these Chapter 11 Cases by the *Second Amended Order Implementing*
7 *Certain Notice and Case Management Procedures*, entered on May 14, 2019 [Docket No. 1996], that
8 the Court enter an order by default on the *Reorganized Debtors’ Twenty-Fifth Securities Claims Omnibus*
9 *Objection (Noteholder Securities Claims)* [Docket No. 13969] (the “**Twenty-Fifth Securities Claims**
10 **Omnibus Objection**”).

11 **RELIEF REQUESTED IN THE**
12 **TWENTY-FIFTH SECURITIES CLAIMS OMNIBUS OBJECTION**

13 The Twenty-Fifth Securities Claims Omnibus Objection seeks to disallow and expunge proofs
14 of claim filed by Securities Claimants who held Utility Senior Note Claims, as defined in the *Debtors’*
15 *and Shareholder Proponents’ Joint Chapter 11 Plan of Reorganization Dated June 19, 2020* (as may be
16 further modified, amended or supplemented from time to time, and together with any exhibits or
17 schedules thereto, the “**Plan**”), confirmed by the Court’s June 20, 2020 Order [Docket No. 8053], at the
18 time of both the January 29, 2019 Petition Date and the July 1, 2020 Effective Date [*see* Docket No.
19 8252]. Each such claimant released the Reorganized Debtors from “any and all claims, interests,
20 obligations, suits, judgments, damages, demands, debts, rights, Causes of Action, losses, remedies, and
21 liabilities whatsoever . . . based on or relating to, or in any manner arising from . . . the purchase, sale,
22 or rescission of the purchase or sale of any Security of the Debtors or the Reorganized Debtors, the
23 subject matter of, or the transactions or events giving rise to, any Claim or Interest that is Treated in the
24 Plan.” Plan § 10.9(b). The claims subject to the Twenty-Fifth Securities Claims Omnibus Objection are
25 listed in **Exhibit 1** to that Objection.

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NOTICE AND SERVICE

The Reorganized Debtors filed the *Notice of Hearing on Reorganized Debtors' Twenty-Fifth Securities Claims Omnibus Objection (Noteholder Securities Claims)* [Docket No. 13971] (the “**Notice of Hearing**”). The Twenty-Fifth Securities Claims Omnibus Objection was supported by the *Declaration of Angela Ferrante in Support of Reorganized Debtors' Twenty-Fifth Securities Claims Omnibus Objection (Noteholder Securities Claims)* [Docket No. 13970] (the “**Ferrante Declaration**”). The Twenty-Fifth Securities Claims Omnibus Objection, the Notice of Hearing, and the Ferrante Declaration were served as described in the *Certificate of Service* of Victor Wong, filed on August 30, 2023 [Docket No. 13998] (the “**Certificate of Service**”). As further described in the Certificate of Service, on August 17, 2023, each holder of a claim listed on **Exhibit 1** to the Twenty-Fifth Securities Claims Omnibus Objection received a notice including the claim number, debtor, claim amount, and the basis for the Reorganized Debtors' objection with respect to the applicable claim to be disallowed and expunged.

The deadline to file responses or oppositions to the Twenty-Fifth Securities Claims Omnibus Objection has passed. The Reorganized Debtors have received the following responses:

Docket No.	Claimant	Claim Nos.	Resolution
Informal	BNY Mellon Service Kapitalanlagegesellschaft mbH (on behalf of Fund VWRA)	99986	Claimant and Reorganized Debtors have resolved the claim that is subject to the Twenty-Fifth Securities Claims Omnibus Objection, and the Reorganized Debtors have therefore withdrawn the Objection as to Claimant.
Informal	IHIP- WellsCap LT Care Escrow	107328	Claimant and Reorganized Debtors have resolved the claim that is subject to the Twenty-Fifth Securities Claims Omnibus Objection, and the Reorganized Debtors have therefore withdrawn the Objection as to Claimant.

Docket No.	Claimant	Claim Nos.	Resolution
Informal	WEC Energy Group, Inc.	107474	Claimant and Reorganized Debtors have resolved the claim that is subject to the Twenty-Fifth Securities Claims Omnibus Objection, and the Reorganized Debtors have therefore withdrawn the Objection as to Claimant.
Informal	DRRT FBO Internationale Kapitalanlagegesellschaft MBH (SSKD-ACB)	100154	Claimant and Reorganized Debtors have resolved the claim that is subject to the Twenty-Fifth Securities Claims Omnibus Objection, and the Reorganized Debtors have therefore withdrawn the Objection as to Claimant.
Informal	KKR Credit Advisors (US) LLC	101906	Claimant and Reorganized Debtors have resolved the claim that is subject to the Twenty-Fifth Securities Claims Omnibus Objection, and the Reorganized Debtors have therefore withdrawn the Objection as to Claimant.
Informal	Thomas A. Mullady	97910	Claimant and Reorganized Debtors have resolved the claim that is subject to the Twenty-Fifth Securities Claims Omnibus Objection, and the Reorganized Debtors have therefore withdrawn the Objection as to Claimant.
Informal	Pacificsource - Taxable	107324	Claimant and Reorganized Debtors have resolved the claim that is subject to the Twenty-Fifth Securities Claims Omnibus Objection, and the Reorganized Debtors have therefore withdrawn the Objection as to Claimant.
Informal	Pacificsource Health Plans Taxable	107320	Claimant and Reorganized Debtors have resolved the claim that is subject to the Twenty-Fifth Securities Claims Omnibus Objection, and the Reorganized Debtors have therefore withdrawn the Objection as to Claimant.

Docket No.	Claimant	Claim Nos.	Resolution
Informal	Tactical Value SPN-Global Credit Opportunities L.P.	101996	Claimant and Reorganized Debtors have resolved the claim that is subject to the Twenty-Fifth Securities Claims Omnibus Objection, and the Reorganized Debtors have therefore withdrawn the Objection as to Claimant.
Informal	Toyota Motor Insurance Company	107316	Claimant and Reorganized Debtors have resolved the claim that is subject to the Twenty-Fifth Securities Claims Omnibus Objection, and the Reorganized Debtors have therefore withdrawn the Objection as to Claimant.
Informal	Keijiroh Yama-Guchi	105896	Claimant and Reorganized Debtors have resolved the claim that is subject to the Twenty-Fifth Securities Claims Omnibus Objection, and the Reorganized Debtors have therefore withdrawn the Objection as to Claimant.
Informal	Hartford Balanced HLS Fund	101161	Claimant has contacted the Reorganized Debtors' counsel in response to the Twenty-Fifth Securities Claims Omnibus Objection and the Reorganized Debtors are adjourning the Objection as to Claimant to a later date to allow Claimant and the Reorganized Debtors to continue discussions with respect to the objection.
Informal	Hartford Corporate Bond ETF	101227	Claimant has contacted the Reorganized Debtors' counsel in response to the Twenty-Fifth Securities Claims Omnibus Objection and the Reorganized Debtors are adjourning the Objection as to Claimant to a later date to allow Claimant and the Reorganized Debtors to continue discussions with respect to the omnibus objection.

Docket No.	Claimant	Claim Nos.	Resolution
Informal	Hartford Multi Asset Income & Growth Fund	101264	Claimant has contacted the Reorganized Debtors' counsel in response to the Twenty-Fifth Securities Claims Omnibus Objection and the Reorganized Debtors are adjourning the Objection as to Claimant to a later date to allow Claimant and the Reorganized Debtors to continue discussions with respect to the omnibus objection.
Informal	Hartford Total Return Bond ETF	101204	Claimant has contacted the Reorganized Debtors' counsel in response to the Twenty-Fifth Securities Claims Omnibus Objection and the Reorganized Debtors are adjourning the Objection as to Claimant to a later date to allow Claimant and the Reorganized Debtors to continue discussions with respect to the omnibus objection.
Informal	Hartford Total Return Bond HLS Fund	102015; 101225	Claimant has contacted the Reorganized Debtors' counsel in response to the Twenty-Fifth Securities Claims Omnibus Objection and the Reorganized Debtors are adjourning the Objection as to Claimant to a later date to allow Claimant and the Reorganized Debtors to continue discussions with respect to the omnibus objection.
Informal	HIMCO Duration Matched Division Ser II	101981	Claimant has contacted the Reorganized Debtors' counsel in response to the Twenty-Fifth Securities Claims Omnibus Objection and the Reorganized Debtors are adjourning the Objection as to Claimant to a later date to allow Claimant and the Reorganized Debtors to continue discussions with respect to the omnibus objection.

Docket No.	Claimant	Claim Nos.	Resolution
Informal	HIMCO US Aggregate Bond Index Division	100877	Claimant has contacted the Reorganized Debtors' counsel in response to the Twenty-Fifth Securities Claims Omnibus Objection and the Reorganized Debtors are adjourning the Objection as to Claimant to a later date to allow Claimant and the Reorganized Debtors to continue discussions with respect to the omnibus objection.
Informal	The Hartford Balanced Income Fund	101165	Claimant has contacted the Reorganized Debtors' counsel in response to the Twenty-Fifth Securities Claims Omnibus Objection and the Reorganized Debtors are adjourning the Objection as to Claimant to a later date to allow Claimant and the Reorganized Debtors to continue discussions with respect to the omnibus objection.
Informal	The Hartford Strategic Income Fund	101189	Claimant has contacted the Reorganized Debtors' counsel in response to the Twenty-Fifth Securities Claims Omnibus Objection and the Reorganized Debtors are adjourning the Objection as to Claimant to a later date to allow Claimant and the Reorganized Debtors to continue discussions with respect to the omnibus objection.
Informal	The Hartford Total Return Bond Fund	101383	Claimant has contacted the Reorganized Debtors' counsel in response to the Twenty-Fifth Securities Claims Omnibus Objection and the Reorganized Debtors are adjourning the Objection as to Claimant to a later date to allow Claimant and the Reorganized Debtors to continue discussions with respect to the omnibus objection.

Docket No.	Claimant	Claim Nos.	Resolution
Informal	Cascade Investment Group, Inc.	108036	Claimant and the Reorganized Debtors have agreed that the Reorganized Debtors will withdraw the objection to this claim without prejudice and the Reorganized Debtors may object to this claim on the grounds set forth in the Twenty-Fifth Securities Claims Omnibus Objection in a subsequent objection, including, but not limited to, a sufficiency objection.
Informal	The Weld Trust	108121	Claimant and the Reorganized Debtors have agreed that the Reorganized Debtors will withdraw the objection to this claim without prejudice and the Reorganized Debtors may object to this claim on the grounds set forth in the Twenty-Fifth Securities Claims Omnibus Objection in a subsequent objection, including, but not limited to, a sufficiency objection.
Informal	Capital Group Global Absolute Income Grower	101921	Claimant and the Reorganized Debtors have agreed that the Reorganized Debtors will withdraw the objection to this claim without prejudice and the Reorganized Debtors may object to this claim on the grounds set forth in the Twenty-Fifth Securities Claims Omnibus Objection in a subsequent objection, including, but not limited to, a sufficiency objection.
Informal	Capital Group Global Allocation Fund (LUX)	101923	Claimant and the Reorganized Debtors have agreed that the Reorganized Debtors will withdraw the objection to this claim without prejudice and the Reorganized Debtors may object to this claim on the grounds set forth in the Twenty-Fifth Securities Claims Omnibus Objection in a subsequent objection, including, but not limited to, a sufficiency objection.

Docket No.	Claimant	Claim Nos.	Resolution
Informal	Capital Group Global Intermediate Bond Fund (LUX)	101698	Claimant and the Reorganized Debtors have agreed that the Reorganized Debtors will withdraw the objection to this claim without prejudice and the Reorganized Debtors may object to this claim on the grounds set forth in the Twenty-Fifth Securities Claims Omnibus Objection in a subsequent objection, including, but not limited to, a sufficiency objection.
Informal	Capital Group World Bond Fund (Canada)	101945	Claimant and the Reorganized Debtors have agreed that the Reorganized Debtors will withdraw the objection to this claim without prejudice and the Reorganized Debtors may object to this claim on the grounds set forth in the Twenty-Fifth Securities Claims Omnibus Objection in a subsequent objection, including, but not limited to, a sufficiency objection.
Informal	Invesco Grp TST Pimco A Core Fund	101974	Claimant and the Reorganized Debtors have agreed that the Reorganized Debtors will withdraw the objection to this claim without prejudice and the Reorganized Debtors may object to this claim on the grounds set forth in the Twenty-Fifth Securities Claims Omnibus Objection in a subsequent objection, including, but not limited to, a sufficiency objection.
Informal	Invesco Grp TST Pimco Core Bond FD	101822	Claimant and the Reorganized Debtors have agreed that the Reorganized Debtors will withdraw the objection to this claim without prejudice and the Reorganized Debtors may object to this claim on the grounds set forth in the Twenty-Fifth Securities Claims Omnibus Objection in a subsequent objection, including, but not limited to, a sufficiency objection.

Docket No.	Claimant	Claim Nos.	Resolution
Informal	Prudential VCAGI2007MCF	107483; 107491; 107515; 107683	Claimant and the Reorganized Debtors have agreed that the Reorganized Debtors will withdraw the objection to these claims without prejudice and the Reorganized Debtors may object to these claims on the grounds set forth in the Twenty-Fifth Securities Claims Omnibus Objection in a subsequent objection, including, but not limited to, a sufficiency objection.
Informal	RI Higher EDU SVGS TST 529 Voya Int	102228	Claimant and the Reorganized Debtors have agreed that the Reorganized Debtors will withdraw the objection to this claim without prejudice and the Reorganized Debtors may object to this claim on the grounds set forth in the Twenty-Fifth Securities Claims Omnibus Objection in a subsequent objection, including, but not limited to, a sufficiency objection.
Informal	Thrivent Mutual Funds - Thrivent Income Fund	107286	Claimant and the Reorganized Debtors have agreed that the Reorganized Debtors will withdraw the objection to this claim without prejudice and the Reorganized Debtors may object to this claim on the grounds set forth in the Twenty-Fifth Securities Claims Omnibus Objection in a subsequent objection, including, but not limited to, a sufficiency objection.
Informal	Thrivent Series Fund, Inc. - Thrivent Income Portfolio	107261	Claimant and the Reorganized Debtors have agreed that the Reorganized Debtors will withdraw the objection to this claim without prejudice and the Reorganized Debtors may object to this claim on the grounds set forth in the Twenty-Fifth Securities Claims Omnibus Objection in a subsequent objection, including, but not limited to, a sufficiency objection.

Docket No.	Claimant	Claim Nos.	Resolution
Informal	VIRGINIA529 VS ING CUSTODY MV	102172	Claimant and the Reorganized Debtors have agreed that the Reorganized Debtors will withdraw the objection to this claim without prejudice and the Reorganized Debtors may object to this claim on the grounds set forth in the Twenty-Fifth Securities Claims Omnibus Objection in a subsequent objection, including, but not limited to, a sufficiency objection.
Informal	National Railroad Retirement Investment Trust	107697	Claimant and the Reorganized Debtors have agreed that the Reorganized Debtors will withdraw the objection to this claim without prejudice and the Reorganized Debtors may object to this claim on the grounds set forth in the Twenty-Fifth Securities Claims Omnibus Objection in a subsequent objection, including, but not limited to, a sufficiency objection.
Informal	IKYF KY Pimco PL Strategy	102224	Claimant and the Reorganized Debtors have agreed that the Reorganized Debtors will withdraw the objection to this claim without prejudice and the Reorganized Debtors may object to this claim on the grounds set forth in the Twenty-Fifth Securities Claims Omnibus Objection in a subsequent objection, including, but not limited to, a sufficiency objection.
Informal	DRRT FBO HELABA INVEST KAPITALANLAGEGE	99635	Claimant and the Reorganized Debtors are in discussions to resolve the claim, and the Reorganized Debtors are adjourning the Objection as to Claimant to a later date to allow Claimant and the Reorganized Debtors to continue those discussions.
Informal	John Hancock Core Bond Fund	107644; 107650	Claimant has WITHDRAWN these claims, and therefore the Twenty-Fifth Securities Claims Omnibus Objection is moot as to these claims.
Informal	John Hancock Core Bond Trust	107684	Claimant has WITHDRAWN this claim, and therefore the Twenty-Fifth Securities Claims Omnibus Objection is moot as to this claim.

Docket No.	Claimant	Claim Nos.	Resolution
Informal	John Hancock Core Bond Trust (JHCBT)	107824	Claimant has WITHDRAWN this claim, and therefore the Twenty-Fifth Securities Claims Omnibus Objection is moot as to this claim.
Informal	BKM KUW	107308	Claimant has WITHDRAWN this claim, and therefore the Twenty-Fifth Securities Claims Omnibus Objection is moot as to this claim.
Informal	Kaiser FND HLTHPLN Prem	107307	Claimant has WITHDRAWN this claim, and therefore the Twenty-Fifth Securities Claims Omnibus Objection is moot as to this claim.
Informal	Mizuho Nova Premier Credit	107300	Claimant has WITHDRAWN this claim, and therefore the Twenty-Fifth Securities Claims Omnibus Objection is moot as to this claim.
Informal	SDV Renten USD 1	107305	Claimant has WITHDRAWN this claim, and therefore the Twenty-Fifth Securities Claims Omnibus Objection is moot as to this claim.
Informal	PBEAKK	107314	Claimant has WITHDRAWN this claim, and therefore the Twenty-Fifth Securities Claims Omnibus Objection is moot as to this claim.

DECLARATION OF NO OPPOSITION RECEIVED

The undersigned hereby declares, pursuant to 28 U.S.C. § 1746, under penalty of perjury that:

1. I am a member of the law firm of Weil, Gotshal & Manges LLP (“**Weil**”), counsel for the Reorganized Debtors.
2. The Court’s docket in the Chapter 11 Cases has been reviewed and Weil has determined that no responses have been filed or informally submitted to the Reorganized Debtors with respect to the Twenty-Fifth Securities Claims Omnibus Objection, except as described herein.

1 WHEREFORE, the Reorganized Debtors hereby request entry of an order disallowing and
2 expunging the proofs of claim listed in the column headed "Claims to be Disallowed and Expunged" in
3 **Exhibit A** to this Request, which lists the claims in **Exhibit 1** to the Twenty-Fifth Securities Claims
4 Omnibus Objection, except as otherwise discussed above.

5 Dated September 29, 2023

6 **WEIL, GOTSHAL & MANGES LLP**

7 **KELLER BENVENUTTI KIM LLP**

8
9 By: /s/ Richard W. Slack

10 Richard W. Slack

11
12 *Attorneys for Debtors and Reorganized Debtors*